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June 21, 2010

### VIA ECF

Honorable James S. Gwin  
United States District Court  
Carl B. Stokes United States Court House  
801 West Superior Avenue  
Cleveland, Ohio 44113-1838

Re: *Melinda Serin, Judson Russ, Long Soui Lim, Peri Kettler, Gordon  
Redner, and Thomas J. Smith, v. Northern Leasing Systems, Inc.,  
Jay Cohen, Rich Hahn, and Sara Krieger*  
Docket No. 06 CV 1625 (JSG)

Your Honor:

This firm represents defendants Northern Leasing Systems, Inc. ("NLS"), Jay Cohen, Rich Hahn and Sara Krieger (the "Individual Defendants"; together with NLS, "Defendants") in the referenced matter.

I write to request additional time to provide expert witness disclosure with respect to Defendants' handwriting expert, Dennis Ryan of Applied Forensics, LLC. Under Rule 26(a)(2)(C)(i) of the Federal Rules of Civil Procedure, I believe that Defendants' disclosure is due today (90 days before the date set for trial). We have identified our expert, and have provided him with materials on which we expect him to base his opinion, but due to his own schedule, he does not believe that he will be able to produce a report for at least seven to ten days. Accordingly, I respectfully request that the Court extend the deadline for Defendants to provide the required disclosure by two weeks. There has been no prior request for an extension of this deadline.

Respectfully submitted,

/s/  
Robert D. Lillienstein

cc. Chittur & Associates  
*Attorneys for Plaintiffs*